

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

RIO PIEDRAS EXPLOSION LITIGATION

CONSOLIDATED CIVIL

SAAVEDRA 'RODROGUEZ et. Al.

Plaintiffs

V

ENRON CORP et. al.

Defendants

*
*
*
*
*
*
*
*
*

NO:3-96-2443

MOTION IN COMPLIANCE WITH ORDER

NOW COMES the undersigned attorney and respectfully informs
the Court as follows:

1. On September 21, 2004 this Court ordered the undersigned attorney to produce his contract of representation in the case of the deceased plaintiff Catalino Diaz in Civil No. 97-2712. The undersigned attorney read this order on Sunday October 10th . Upon information and belief, this order can only refer to an order last year which instructed the undersigned attorney to file a declaration of heirship re: plaintiff Catalino Diaz . This order also instructed the undersigned to provide a copy of the contract of representation to one of Mr. Catalin Diaz' heirs, Luz Diaz, who informed the undersigned that she had sent a letter to this Court when the undersigned delayed in sending her the same and failed to timely return a phone call. .
2. At the time the undersigned received this first order I had already complied with both filing the declaration of heirship and had already sent Luz Diaz via fax Luz Diaz a copy of the original contract signed

by her father. At the time of this last event , the undersigned also apologized to Ms. Diaz for the delay and further explained in our phone conversation that I was unable to timely comply with her request given the fact that my father suffered a stroke and that she could call Riverview Hospital in Red Bank , NJ to verify that fact in an effort to dispel any other reason as to why I did not respond to her phone call. Following our telephone conversation I faxed her a copy of the standard 33% contingency fee contract which was signed by her father and which I confirmed that she received. Subsequent to the above Ms. Diaz informed me that she had in fact informed the Court that I had complied with her request for this contract.

3. In response to this Court's recent order I have attempted to find the fax communication along with the contract in question but have not been able to locate same. I have spent well over an hour looking for this document in order to comply with this Court's order and now believe that it was probably thrown away. With regard to the first order the undersigned attorney apologizes to this Court for his failure to file an informative motion to the effect that he had already complied with that ordered and also requests that this Court excuse his delay in responding to the order object of this motion

WHEREFORE , the undersigned attorney respectfully requests that the Court take notice of the above

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 18th day of October 2004.

s/PETER J. SATZ
Peter J. Satz Bar Number 201203
Attorney for Plaintiff Catalino Diaz
100 Calle Fortaleza
SAN. JUAN , PR
Tel: (787) 725-5103
Fax (787) 722-0258
E-Mail Petersatzhanley@aol.com

